

Draft Meeting Notes		Division of Environmental Health Department of Health Third SRDC Safety Workgroup 2-22-05	
Facilitator:	Nancy Bernard	Note Taker(s):	Nancy Bernard Mark Soltman
Attendees:	Candi Wines, SBOH; John Richards, OSPI; Mike Cotey, L&I; Gabrielle Toutonghi, L&I; Julie Awbrey, Spokane RHD; Steve Barber, Deputy State Fire Marshall; Scott LaBar, ESD 112; Mark Cooper, parent; Thelma Simon, parent; James Green, community; John Wolpers, Kittitas HS, EHD; Mary Sue Linville, WSRMP; Mary Miller, L&I; Mark Soltman, DOH, Ed Foster, Seattle Archdiocese; Greg Baldwin, WSSDA; Peggy Sandberg, ESD 112; Kitty Johnson-Woods, EVSD; Dave DeLong, TPCHD; Don Leaf, WSEHA (PM); Doug Mandt, WSSTA (PM)		
Absent:	Jim Kerns, Shirley Carstens, Dave Waddell, Scott Emry, Karen VanDusen, UW,	Guests:	

AGENDA ITEMS	DISCUSSION
Introductions	Comments from Candi on the SBOH & process of the School Rule Development process.
ACTION	
Review of summary notes from 1-11-05	Additions/corrections: -Try not to finger point specific districts or LHJs -Paul Clark: issue of size of Health Room needs to be considered -Gabrielle: FA/CPR section: add allergy training, anaphylactic shock, EPI pens.
ACTION	
Candi Wines, SBOH	Please fill out the survey and return to us.
ACTION	Began Decision Agenda Since technology to allow remote sites to view the Word document is not working, actual voting will be at the next (3-15) meeting.

AGENDA ITEMS	DISCUSSION
<p>PLAYGROUNDS</p>	<p>Discussion of issues.</p> <p>Proposal A: Modify WAC 246-366-040 to include playgrounds specifically so that the plans for playgrounds will be reviewed under this WAC, and there will be a pre-opening inspection and playgrounds will be included in periodic inspections.</p> <p>Proposal B developed: Develop a new section in WAC to address playgrounds & playground equipment. Specifically address requirements for existing facilities and the development of new facilities. Include the use of new and used equipment. Relate to the plan review portions of the WAC to assure that review & approval occurs in the planning process as appropriate. Also relate to the inspection by CPSI or LHJ inspectors and requirements of the WAC.</p> <p>General agreement. Further develop for consideration at next meeting.</p> <p>Discussion of #2: inclusion of playgrounds in Safety section. Can we have one playground section, or reference in 2 areas as currently done?</p> <p>#2A: Modify WAC 246-366-140, Safety, to include playgrounds in the list specifying that “The secretary in cooperation with the state superintendent of public instruction shall review potentially hazardous conditions in schools which are in violation of good safety practice, especially in playgrounds, laboratories, industrial arts and vocational instructional areas. They shall jointly prepare a guide for use by department personnel during routine school inspections in identifying violations of good safety practices. The guide should also include recommendations for safe facilities and safety practices.”</p> <p>#3A: Prohibit the installation of used or homemade playground equipment that doesn’t comply with current CPSC guidelines and ASTM standards.</p> <p>#3B: Playground equipment must be constructed to the ASTM standards and installed consistent with the manufacturer’s instructions and the CPSC guidelines.</p> <p>ASTM F 1487-01: Standard Consumer Safety Performance Specification for Playground Equipment for Public Use Consumer Product Safety Commission <i>Handbook for Public Playground Safety</i>, 1997</p> <p>ASTM F 1292: Method to Test Impact Attenuation of Safety Surfacing for Playgrounds</p> <p>#3C: Prohibit the installation of used or homemade playground equipment that has not been reviewed and approved by the LHJ or a CPSI, as consistent with the “standard of practice” for playground equipment.</p> <p>Discussion on IPEMA certification. CPSC Guidelines, not standards. CPSC deals w/ the end user. ASTM manufacturer mainly.</p> <p>Discussion of putting ASTM/CPSC in rule. International Fire Code & International Building Code: adopted by date. Gives everybody a standard to operate from</p>

AGENDA ITEMS	DISCUSSION
Playgrounds continued	<p>Surfacing: A: Prohibit use of playgrounds at schools that do not have proper, maintained surfacing. B: Playground surfacing must be constructed with materials in compliance with ASTM F 1292: Method to Test Impact Attenuation of Safety Surfacing for Playgrounds standard, and maintained to maximize protection, consistent with the 1997 CPSC guidelines.</p> <p>-Implied through the other issues. Can go from being proper to improper very quickly. May be very difficult to regulate. Can it be re-worded to say regular maintenance? Agree that there should be regular maintenance, but if in rule, needs to be more specific. Seasonal issues: if under snow or ice, recommend not played on. Recommend not playing on any high equipment if snow or ice. Enforcement: issues, someone may prohibit use when even a minor violation is found. Suggestion: playground surfacing constructed with materials in compliance with ASTM, and maintained consistent w/ CPSC guidelines.</p>
ACTION	Will rework and vote 3-15.
Contaminated Soils	<p>Reworked proposal A: Modify WAC 246-366-030 (Site Approval) to require schools to evaluate the potential for soil contamination at proposed school sites, especially in areas to be used for playgrounds and sports / play fields. A soil sampling protocol should be based on this evaluation in accordance with accepted public health scientific protocols. Phase 1 Environmental Assessment. / ASTM Refer to state purchasing... .. identify range of issues addressed in the assessment... How to address hydrology & groundwater / SBOE WAC? / What about gifted property? GSA requirements?</p> <p>#2A: Modify WAC 246-366-040 (Plan Review & Inspection of Schools) to require schools to integrate soil remediation into school design and construction planning, including playgrounds and sports / play fields, based on proposed required evaluation and sampling.</p> <p>Discussion of broadening to require a Phase I evaluation. Gap that has resulted in problems. OSPI requires a soil test for structural purposes, includes ground water analysis. In SBOE WAC, even if not a state match. (Because this is on property). Doesn't require a Phase 1 – maybe where this should be addressed. Does this cover gifted property? 246-366 -030 already requires site approval by LHO. Late '80's a guidance document – Vessie's draft that outlined what LHJs should look at. Could this WAC refer to SBOE WAC? Create connection. Discussion of HB 1605 on requiring the testing of soils (qualitative assessment) in existing playfields. Mitigation vs. remediation, phased compliance. We will craft a proposal around this issue.</p>
ACTION	Craft proposal around contaminated soils, existing facilities, soil testing & remediation. Lead, arsenic, CCA leaching from treated lumber, etc

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CCA Treated Wood	<p>A: CCA treated wood should not be used in new installations. Current EPA recommendations for treated wood products for playsets should be followed. If there is CCA treated wood in playsets, children should not be allowed to eat on the playsets and should wash their hands with soap and water after playing on them. EPA / CPSC recommendations for applying penetrating coatings such as oil-based semi-transparent stains (frequency varies depending on the climate) should be encouraged.</p> <p>New: B: CCA treated lumber should not be used in new installations, or the repair or modification of existing structures. Playground equipment & sites shall be evaluated for risk presented by the presence of CCA-treated lumber using EPA standard methodologies, including evaluation of soils underlying the equipment. Plans for replacement or remediation of contamination from CCA treated lumber & playground equipment shall be developed.</p> <p>Discussion:</p> <ul style="list-style-type: none"> -Dermal absorption while touching, hand washing too late. Does leach into soils. Grinding wood – can contaminate wood chips. -New construction: CPSC already prohibits. -Schools should remediate these structures. -We have developmental preschools in our schools. Hands are in their mouths. -As a practical matter, children are not going to wipe their feet or wash their hands. -Need some type of phased compliance to deal with this. -There are standards for assessment. EPA has limits for soils. -There is already guidance for chipping/burning/recycling woods. -Continue management if you know you have it – prior to remediation.
ACTION	Will work on language for 3-15.
Fall Hazards	<p>Probably doesn't belong in a section under "Buildings," this is an internal and external issue. Loading docks also an issue.</p> <p>This is a tough issue. Sometimes it's obvious, sometimes it's an extreme.</p> <p>Cannot regulate all behavior.</p> <p>Building codes seem to cover this issue.</p> <p>Sometimes compliance with BCs is not enough. Need to know what kids will do.</p> <p>Could B&C council better address this?</p> <p>General safety regulations should address this.</p>
ACTION	Delete Proposal A related to fall hazards. Not considered necessary.

AGENDA ITEMS	DISCUSSION
PE/Athletics/Sports	<p>New A: Modify WAC 246-366-140, Safety, to include sports, athletics, and PE in the list specifying that “The secretary in cooperation with the state superintendent of public instruction shall review potentially hazardous conditions in schools which are in violation of good safety practice, especially in laboratories, industrial arts, vocational instruction, sports, athletics and PE areas. They shall jointly prepare a guide for use by department personnel during routine school inspections in identifying violations of good safety practices. The guide should also include recommendations for safe facilities and safety practices.”</p> <p>#2A: Add injury prevention guidance for high risk activities to the OSPI/DOH K12 H&SG, Section S, Athletics, based on a review of claims, CPSC, the Institute for Preventative Sports Medicine, etc. Include references to proper maintenance & sanitation of equipment. - Future H&S guide revision.</p> <p>Discussion:</p> <p>-PE instructors may not be trained or qualified in minimal first aid....se other proposal Injuries and disease transmission. -Do we need this in the WAC, is the K12 enough? Don’t want to conflict with PE curriculum. PE teachers aren’t required to have FA/CPR. -Could include sports and athletics. -Problems in the past with the vagueness of this section 140. Left too much to the discretion of the LHJs. -This WAC is the index for the K12.</p>
ACTION	<p>Keep proposal as is. Move language of #2A into support for #1.</p>
Sanitation/Infection control	<p>New #3A: Address requirement for proper sanitation and infection control in a specific subsection of WAC 246-366. Provide a framework for addressing this topic in rule, with supporting specific recommendations and best management practices in guidance, such as the K-12 H&S guide, and OSPI infection control guide.</p> <p>Discussion:</p> <p>-Don’t link to athletics/sports, consider separate section. -Infection control should be in the WAC. Infectious disease control guidelines will be maintained. In general, not adequately addressed. -Infectious disease guide doesn’t speak specifically to infectious disease control. Blood borne pathogens standards, may need to reference, may not since it only pertains to employees, but there is some overlap -Food service sanitation already spelled out in WAC. -L&I hazardous communication applies sanitation chemicals. Current Hazardous Communication law applies to teachers, coaches, etc. -Update B007 in the K12 H&SG in accordance w/ current HazCom.</p>
ACTION	<p>Will work on language for 3-15.</p>

AGENDA ITEMS	DISCUSSION
First Aid / CPR	<p>A: Include in WAC 246-366 a requirement for first aid & CPR training, on a regular basis, for science, C&T Ed, PE teachers, playground supervisors, coaches, bus drivers, and some percentage of classroom teachers. Include training in dealing with asthma.</p> <p>Discussion:</p> <ul style="list-style-type: none"> -Used to be a requirement to maintain a Voc Ed certificate. Still is, but don't have to keep it current. -Many people have outdated FA training. Should include Allergy/asthma/epi pens. -Law requires that to be able to administer medication, you need to be trained. An unlicensed person can administer an epi pen, allowed / not required. -Use the language "current" for FA & CPR training. All should be trained. -People don't want to be responsible unless they're trained. -Reference the laws that affect this. Schools have their own policies in this area. -Liability coverage when working within your scope of duties. If you're taking students on remote trips where they won't be w/i reasonable 911 response. -FA training should be specific to the school age child, not just the general public class. -Anyone who is alone with a group of children should have training. Lunch room supervision, field trips, etc.
ACTION	<p>Craft new proposals: separated FA from asthma</p> <p>Proposal A: include requirement for current FA/CPR, etc.</p> <p>B: include in WAC 246-366 a requirement for training in asthma, allergy response, breathing issues. Recognition of medical conditions.</p>
Science Labs	<p>Discussion:</p> <ul style="list-style-type: none"> -K12H&SG has very little reference to fume hoods, safety training needs, curriculum issues – some reference now in the Grade Level Expectations from OSPI, the WASL, etc. -L&I standards – are they an adequate standard for children? L&I can only enforce PPE for teachers, not children. Once upon a time, all shops were required to comply with WISHA standards. Could we do this with science labs? -We have the guidance, we don't have enforcement. -Largest problem: appointment of the Chemical Hygiene Officer, staffing/time issue -Could possibly solve with the language of the current food code – person-in-charge language. -WISHA lab standards are performance standards. May not be as helpful to schools. - -Some of the airborne contaminant levels in WISHA are appropriate to adults, not children. -ECY has a lab safety standard that can also be referenced. Worthy of a separate section in the WAC. -Conflict with local BC's that don't address science safety issues. Lack of oversight.
ACTION	Craft a proposal for consideration 3-15.

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Career & Technical Education	<p>Discussion:</p> <ul style="list-style-type: none"> -As far as shop safety, it's come a long way. The largest majority of injuries are in middle schools, not covered by the C&TE rules. -Would like to amend the laws so that any type of shop facility has to be in compliance with WISHA and best practices. -Generality: safety in the academic areas, mandate for appropriate safety for the type of activity. Specifics in the guidance document. This includes special dangers in art rooms, music rooms. Work on specifics. -Fire inspections: enforcing WISHA standards drive shop teachers nuts. Identify other issues. Steve can propose changes into fire codes so that they can also enforce. -L&I often finds that administration wants to treat teachers as independent contractors, when really it's administration's responsibility to see that there is enforcement.
ACTION	Craft a proposal for consideration 3-15.
Chemical storage, use, disposal, spill clean-up	<p>Discussion</p> <ul style="list-style-type: none"> -green cleaning goes beyond IAQ issues, includes safety issues. -Is this area covered in other WACs, HazCom law? -grounds maintenance storage requirements? -fire code covers some -WISHA / IFC rules on storage of flammables, combustibles, incompatibles. -Issues with IAQ that the Fire Dept is concerned with from chemicals. -Buildings need to be kept clean and good repair – what does this mean? Relates to a wide range of risks and exposures for students & teachers.
ACTION	Craft a proposal for consideration 3-15.
HANDOUTS	NEXT MEETING
Summary notes, 1/11/05 and 2/1/05. Decision Agenda 2/22/05	<p>3/15/05</p> <p>Originating at the Burien Puget Sound ESD.</p> <p>Video Conferencing from ESD 101, ESD 112, OSPI, Moses Lake SD</p>